

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

SHEILA J. PORTER

Plaintiff,

v.

ANDREA CABRAL, SUFFOLK COUNTY  
SHERIFF'S DEPARTMENT, SUFFOLK  
COUNTY and CORRECTIONAL MEDICAL  
SERVICES, INC.

Defendants.

Civil Action No. 04-11935-DPW

**SHEILA J. PORTER'S UNOPPOSED MOTION TO EXTEND DEADLINE TO  
RESPOND TO SUFFOLK DEFENDANTS' MOTION TO COMPEL**

Now comes Plaintiff Sheila J. Porter, by and through undersigned counsel, and respectfully requests that this Court extend the deadline for her to respond to Andrea Cabral, Suffolk County Sheriff's Department and Suffolk County's ("Suffolk Defendants") Motion to Compel by one week, to November 21, 2005. The Suffolk Defendants do not oppose this motion. As grounds therefore, Mrs. Porter states as follows:

1. On October 28, 2005, the Suffolk Defendants filed a Motion to Compel testimony from the Plaintiff.
2. Pursuant to Local Rule 7.1(B)(2), Mrs. Porter's Opposition to this motion is due on November 14, 2005.
3. Counsel for Mrs. Porter is preparing Oppositions to the Suffolk Defendants' and Correctional Medical Services, Inc.'s Motions for Summary Judgment, which are also due on Monday, November 14<sup>th</sup>. Thus, counsel is unable to devote the time necessary to respond to the Motion to Compel.

4. The requested extension will not prejudice any party and should require no adjustments to the Court's schedule. Should the Court decide that oral argument is necessary on the Motion to Compel, argument could be heard during the previously-scheduled December 14, 2005 hearing.

5. Counsel for Mrs. Porter has conferred with counsel for the Suffolk Defendants and she assents to the instant Motion.

WHEREFORE, Mrs. Porter requests that the Court grant a one-week extension to respond to the Suffolk Defendants' Motions to Compel such that her response would be due on November 21, 2005.

Respectfully Submitted

SHEILA J. PORTER

By her attorneys,

/s/ David Schumacher

Joseph F. Savage Jr. (BBO #443030)

David S. Schumacher (BBO #647917)

GOODWIN PROCTER LLP

Exchange Place

Boston, MA 02109-2881

617.570.1000

Dated: November 8, 2005

**CERTIFICATION UNDER LOCAL RULE 7.1**

I, David S. Schumacher, hereby certify that counsel for Sheila Porter conferred with counsel for the Suffolk Defendants and she assents to the instant Motion.

Dated: November 8, 2005

David S. Schumacher

David S. Schumacher

| [LIBA/1644344.1](#)

Formatted: Font: 8 pt

Deleted: LIBA/1644344.1